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10 **UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF NEVADA**

12 CATHERINE NICHOLS,
13 Plaintiff,

14 v.

15 CREDIT UNION 1 and EXPERIAN
16 INFORMATION SOLUTIONS, INC.,
17 Defendants.

Case No.: 2:17-cv-02337-APG-GWF

STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF TIME
FOR DEFENDANT TO RESPOND TO
COMPLAINT
(FIRST REQUEST)

18 Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rules 6-2, 7-1, Plaintiff
19 Catherine Nichols and Defendant Credit Union 1, stipulate through their undersigned counsel that
20 Defendant's deadline to move, answer, or otherwise respond to the Complaint is extended from
21 January 10, 2018, through and including January 19, 2018. Plaintiff consents to the extension.

22 Good cause exists for the extension given that Defendant recently retained counsel, is still
23 investigating Plaintiff's allegations against it, and Plaintiff's counsel recently communicated a
24 settlement offer that is being evaluated. Defendant expects that by January 19, 2018, it will be in
25 a position to determine if the claim against it can be resolved or if it will be necessary for
26 Defendant to move, answer, or otherwise respond to the Complaint.

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1 It is further agreed that nothing in this stipulation shall be deemed to waive or prejudice
2 any claims or defenses of any party to this action.

3 DATED: January 9, 2018

FENNEMORE CRAIG, P.C.

4
5 By: /s/ Leslie Bryan Hart

6 Leslie Bryan Hart

7 Brandi M. Planet

8 300 E. Second Street, Suite 1510

9 Reno, Nevada 89501

Attorneys for Defendant Credit Union 1

10 DATED: January 9, 2018

KNEPPER & CLARK, LLC

11
12 By: /s/ Miles N. Clark

13 Miles N. Clark

14 Matthew I. Knepper

15 10040 W. Cheyenne Ave., Ste. 170-109

16 Las Vegas, Nevada 89129

Attorneys for Plaintiff Catherine Nichols

17 **IT IS SO ORDERED.**

18
19 
UNITED STATES MAGISTRATE JUDGE

20
21 DATED: __1/10/2018 _____